

# SANDLER REIFF

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COMMISSION

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November 16, 2015

Via E-Mail

Jeff S. Jordan, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: RR 15L-36

Dear Mr. Jordan:

The undersigned serves as counsel to the Democratic Executive Committee of Florida ("DECF"), and Judy Mount, in her official capacity as Treasurer. I am writing in response to the Commission's letter of October 5, 2015 in connection with the above-referenced referral. For the reasons set forth below, the DECF respectfully requests that OGC recommend that no further action be taken in this matter or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

This matter relates to amendments filed by DECF to its 2014 Pre-General Report, which resulted in the additional disclosure of \$232,457.33 in receipts. This increase in receipts was the result of the omission of one transfer in that amount from the DECF's Levin account to its federal account. The omission was caused by the confusion regarding the proper disclosure of Levin Activities. In 2014, the committee formed an account for Levin Funds and raised and spent Levin funds for the first time since 2010. The staff member in charge of preparation of the committee FEC Report did not have any experience in the disclosure of Levin activity and the omission was the result of confusion in the proper disclosure of Levin activities. As you know, Levin Activity Reporting is unique to state and local party committees and adds several schedules and additional reporting on state and local party committees which is not required of any other type of federal political committee.

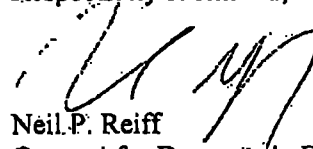
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Subsequent to the election, the committee consulted with counsel on the proper handling of Levin activities. During this review, it was discovered that the transfer in question was inadvertently omitted from disclosure reports. After a thorough review during the preparation of the DECF's Year-End Report, an amendment to correct Levin disclosure, which included the transfer in question, was filed on January 21, 2015, approximately three months subsequent to the original report.

Although DECF acknowledges this reporting error, the Commission to dismiss this matter or refer this matter to its Alternative Dispute Resolution. In summary, this error consisted of one transaction, was caused by the confusion surrounding the proper disclosure of Levin Activity, and was promptly corrected.

If you have any further questions, please contact me at (202) 479-1111.

Respectfully submitted,



Neil P. Reiff  
Counsel for Democratic Executive  
Committee of Florida, and Judy  
Mount, in her official capacity as  
Treasurer

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